

Questions & Answers

Pacific Gas and Electric Operator Qualification Plan

Questions and Answers – March 6, 2001

The Plan

The PG&E Gas Operator Qualification Plan outlines the company's responsibilities and procedures to ensure that it has a qualified workforce and that its operations comply with relevant Federal Pipeline Safety Regulations.

In compliance with Sections 106 and 205 of the Pipeline Safety Act of 1992 and Section Four of the Accountable Pipeline Safety and Partnership Act of 1996, the U.S. Department of Transportation (DOT) through its Research and Special Programs Administration (RSPA) adopted regulations requiring that all individuals who operate and maintain pipeline facilities:

- be qualified to operate and maintain the pipeline facilities, and
- have the ability to recognize and react appropriately to abnormal operating conditions that may indicate a dangerous situation or a condition exceeding design limits.

Scope of Plan

The scope of the gas operator qualification plan applies to Utility Operations and HR Learning Services.

Employee Obligation

All employees are responsible for knowing and understanding the gas operator qualification plan. All employees are also responsible for performing without supervision *only* those covered tasks for which they have been qualified under this plan. Refer to section 1.4 of the plan for non-qualified individuals.

It is also the employee's responsibility to know which tasks they are *not* qualified to perform.

All employees (including hiring hall) are also responsible for communicating to local supervision any significant changes that affect covered tasks they are assigned to perform.

Managers/Superintendents/Supervisors

All department managers/superintendents/supervisors share the responsibility to ensure that the skill evaluations have been completed for the employees with gas covered task responsibilities in their areas and that the evaluations were properly documented. The department managers/superintendents/supervisors are also responsible for developing any skill deficiencies found during the gas operator qualification evaluation(s).

Most commonly asked questions

1.	Q.	Who will assign covered tasks/subtasks?
	A:	<i>Local supervision is responsible for assigning covered tasks/subtasks for its work group.</i>

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2.	Q.	What do you do with an unqualified person?
	A:	<i>A person who is not qualified to perform a task/subtask under the OQ Rule can perform the work as long as they are directly supervised by a qualified person.</i>
3.	Q.	Who is responsible for inputting information in Training Server?
	A:	<i>██████████ HR Learning Services. Front Line Supervisor will submit roster to ██████████ for input and copy the LGOQPC (Local Gas Operator Qualification Plan Coordinator).</i>
4.	Q.	Who developed the Company OQ Plan?
	A:	<i>HR Learning Services, E&P-Gas Distribution and Technical Services, and CGT and Customer Field Services with directions from clients.</i>
5.	Q.	Who developed the tasks?
	A:	<i>The IUWG (Inter Utility Work Group). Which consisted of California utilities and municipalities working together to reach consensus on the tasks. Also Southwest Gas of the State of Nevada assisted as well.</i>
6.	Q.	Who developed the subtasks?
	A:	<i>First line supervisors assisted in the development of all subtasks.</i>
7.	Q.	How do you know if roster was faxed to ██████████?
	A:	<i>There are checks and balances, and OQ LGOQPC's will keep a hard copy.</i>
8.	Q.	Local Gas Emergency Coordinator, will title be eliminated? Or have a name associated with that title?
	A:	<i>When the titles are changed and responsibility is assigned, the OQ Plan will be modified to reflect the change.</i>
9.	Q.	Define what an evaluator is?
	A:	<i>An evaluator is a person who by knowledge, skill and/or experience is and has the ability to determine if an individual has qualification to perform a given task. The evaluator must also be able to recognize and react appropriately to abnormal operating conditions that may indicate a dangerous situation or a condition exceeding design limits.</i>
10.	Q.	Is this training going to run over to contractors?
	A:	<i>First of all, OQ is not a training program. Secondly, contractors will not be trained with respect to OQ nor qualified unless they are performing a covered task. In most situations contractors will not be performing covered activities.</i>
11.	Q.	What is the definition of a qualified individual?
	A:	<i>A worker who has been evaluated under the requirements of the Company OQ Plan and has the knowledge, skill and experience to perform the task for which he/she has been qualified. The qualified individual must also have the ability to recognize and react appropriately to abnormal operating conditions that may indicate a dangerous situation or a condition exceeding design limits.</i>

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12.	Q.	What task is different from the other utilities?
	A:	<i>Cast Iron is the one task that other utilities/municipalities do not have in the State of California.</i>
13.	Q.	Why is excavating excluded?
	A:	<i>For an activity to be a covered task, that activity must meet each criterion in the 4-part test established under the OQ Rule. Excavating is not a requirement of 49 CFR Part 192 nor 195.</i> A task that is: <ul style="list-style-type: none"> ▪ performed on a pipeline facility; ▪ an operations or maintenance task; on a pipeline facility; ▪ performed pursuant to a requirement in 49 CFR Part 192 or Part 195; and ▪ affects the operation or integrity of the pipeline.
14.	Q.	What do you do if a person goes over you (TTT) during the process?
	A:	<i>If an individual's qualification lapses and he/she performs a covered task, a determination must be made as to why that person's qualifications lapsed and no immediate action was taken. Then corrective action must be taken to avoid a repeat.</i>
15.	Q.	Is meter reading a covered task?
	A:	<i>No, meter reading does not meet the 4-part test for determination of a covered task listed above in question #13 (specifically 3rd bullet item).</i>
16.	Q.	If a meter reader while reading a meter discovers a gas leak, would that require that he/she be qualified for the next occurrence?
	A:	<i>No, their primary work duty is to read the meter, not to investigate gas leaks/problems. However, under universal employee obligation, he/she must report any situation that may adversely affect Company facilities.</i>
17.	Q.	Is performing a tie in covered under OQ?
	A:	<i>Yes, the performance of that tie-in is a covered task as it meets the 4-part test?</i>
18.	Q.	Is pre-fab work covered?
	A:	<i>No, pre-fab work is not a covered task as it is performed on a section of pipeline not in service nor connected to a section in service (pressurized or otherwise). Does not meet the 4-part test.</i>
19.	Q.	Employee working as part of a crew, replacing a pipeline. Employee is using a locator so they can lay out job. Is this a covered task using the locator and laying out the job?
	A:	<i>No, locating for layout work is not a requirement of CFR 49 and thus does not meet the 4-part test. Locating in conjunction with USA is a covered task as it meets the 4-part test. Note: Under Company Code of Safe Practice Rules, P3, P10 and P11 individuals must be qualified to perform any locating work.</i>

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20.	Q.	How does this affect first line supervisor's?
	A:	<i>The OQ rule affects all supervisors, as it is their responsibility to implement the Company OQ Plan.</i>
21.	Q.	Where did these dates come from (Qualification Plan Milestone Dates)?
	A:	<i>The dates were established under the Rule Making Provision of the Department of Transportation and are centered around publication in the Federal Register.</i>
		<ul style="list-style-type: none"> • Work performance history review may be used as a sole evaluation method for qualification of individuals who were performing a covered task on a regular basis prior to August 27, 1999. • The Operator Qualification Rule effective date is October 26, 1999. • Each operator must have a written qualification plan in place by April 27, 2001. • Each operator must have completed covered task qualifications by October 28, 2002.
22.	Q.	When do we start qualifying employees?
	A:	<i>May 1, 2001</i>
23.	Q.	How will updates be distributed?
	A:	<i>Updates will be distributed by the System Gas Operator Qualification Plan Coordinator to LGOQPC's (Local Gas Operator Qualification Plan Coordinator's).</i>
24.	Q.	Is the Plan going to be on HRLS' website?
	A:	<i>No, it is on Gas Distribution's web site.</i>
25.	Q.	What if a person still doesn't qualify after 3 times?
	A:	<i>Most likely this would be addressed as a performance problem, not an OQ problem. However, the person can continue to perform the task if working under direct supervision of another OQ qualified person.</i>
26.	Q.	How would we handle an emergency, if we brought ee's up from another company, i.e. SCE?
	A:	<i>The Company may accept their qualification plan or qualify the individual under its plan. At the minimum a tailboard will be conducted to outline the Company method of performing certain tasks.</i>
27.	Q.	Who is going to keep and track this information?
	A:	<i>The LGOQPC is responsible for implementing, monitoring and auditing the Plan.</i>
28.	Q.	Who will make up the written and oral exams?
	A:	<i>HR-Learning Services.</i>
29.	Q.	Will LGOQPCs have to brush up on title 200 classifications?
	A:	<i>Yes, and also title 300 classifications.</i>
30.	Q.	Where do we get the training materials?
	A:	<i>██████████ is putting together the binders and diskettes for the coordinators to take out and use for training.</i>

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31.	Q.	What is RQ?
	A:	<i>RQ - Required Qualification is a preliminary step in determining who will be qualified to perform a certain task/subtask. This designation is also needed to assist LGOQPCs (Local Gas Operator Qualification Plan Coordinator's) in determining the number of individual qualifications needed. Then monitor the qualification process.</i>
32.	Q.	What if supervisors ask the LGOQPC about costs?
	A:	<i>LGOQPCs will charge their time to accounting established by their director/superintendent.</i>
33.	Q.	When a person is actually qualified, who fills out the "RQ" card (Summary Sheet)?
	A:	<i>The Evaluator does, and then faxes the form to [REDACTED] for OM&C or Janet for CGT, and cc the LGOQPC. Retains the original until all qualifications have been completed. Then mail original as indicated above.</i>
34.	Q.	Once RQ's are done and they go to [REDACTED], are they inputted into Training Server?
	A:	<i>Yes, but preliminary only until the original summary is mailed for inputting into the database.</i>
35.	Q.	Is there a difference on timing with sending the "RQ's" to [REDACTED] and then the "Q" boxes?
	A:	<i>It depends on whether or not the evaluator is able to indicate pre-qualifications with the "RQ" designation and then complete the process by performing the actual evaluations. If he/she can do it all at once, then yes all paper work can be mailed at the same time.</i>
36.	Q.	What happens if an employee transfers to another area, what happens to his training records?
	A:	<i>The receiving supervisor has the responsibility for determining that individual qualifications and obtaining his/her training records. Since training records will be in Training Server the supervisor will be able to get a quick read of his/her qualifications.</i>
37.	Q.	With regards to training records, will the database suffice vs. the actual hardcopy?
	A:	<i>Under the OQ Rule, maintaining the data electronically is acceptable; however, the Company will maintain paper copies for the foreseeable future.</i>
38.	Q.	Is there a sheet for each task?
	A:	<i>Yes, there are sheets made up for each task and sub task.</i>
39.	Q.	Can anyone conduct evaluations under the OQ Plan?
	A:	<i>No, only pre-designated individuals will have responsibility for evaluation individuals under the Company OQ Plan. In most cases evaluators will be frontline supervisors. Training instructors and specialists may also evaluate individuals.</i>
40.	Q.	Who will make this determination?
	A:	<i>LGOQPCs</i>

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41.	Q.	Can an evaluator from one yard, evaluate someone in another yard?
	A:	Yes...
42.	Q.	What are the references adjacent to each task/subtasks?
	A:	<i>The references are there to assist evaluators when it is necessary to review the requirements for the work with an individual who may want or need additional information regarding the work covered under the OQ Rule. It is also there to assist the evaluators where necessary.</i>
43.	Q.	What method do we use if we have employees less than 1 year?
	A:	The OQ Rule does not make reference to time in service. It does stipulate the type of qualifications required given a persons performance experience. For example, if a person has not been performing an OQ task prior to August 27, 1999, he/she can only be qualified through the "Initial" process. If the individual has been performing the task prior to August 27, 1999 a person's work history review is sufficient for qualification, <i>i.e. Work Performance History Review.</i>
44.	Q.	Corrosion Control has 9 sub tasks; do we fill out 9 forms?
	A:	<i>Not necessarily, if you are evaluating a corrosion mechanic completing the main task (03-00.00) may be sufficient. On the order hand, given that you are evaluating a crew leader then you would assign by subtasks.</i>
45.	Q.	When will OM&C implement the program?
	A:	<i>May 1, 2001</i>
46.	Q.	If we have qualified an employee for 5 out of 6 tasks under a primary, does someone delete sub tasks and create the primary task?
	A:	<i>No, that individuals record will reflect the 5 subtasks.</i>
47.	Q.	If you de-qualify someone how long must there record remain on file?
	A:	<i>For a minimum of 5 years following the year for which they were no longer qualified.</i>
48.	Q.	Is it possible to do presentations for each area?
	A:	<i>Yes, contact any one from the OQ Help Desk and they will assist you in arranging/delivering presentations.</i>
49.	Q.	How will we monitor checks and balances with the frequent moves in GC?
	A:	<i>The receiving supervisor has the responsibility for determining that individuals qualifications and obtaining his/her training records. Since training records will be in Training Server the supervisor will be able to get a quick read of his/her qualifications.</i>
50.	Q.	When will materials be ready to give to the evaluators?
	A:	<i>Once the names come back in to JDW, the material will be ready.</i>
51.	Q.	What is the deadline to get "RQ's" in?
	A:	<i>Immediately after completing "RQ" on summary form.</i>
52.	Q.	What accounting do we use for meetings that require lodging?
	A:	<i>LGOQPCs will charge their time to accounting established by their director/superintendent.</i>

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53.	Q.	What will it cost per qualification?
	A:	<i>It is estimated that the average cost per transitional qualification is between \$50.00 and \$70.00. Approximately 90% of the evaluations will be using the transitional process.</i>
54.	Q.	After determining which tasks/subtask an individual will be qualified to perform, is it permissible to assign a clerk to fill personal data on each of the tasks/subtask qualification sheets?
	A:	<i>Yes, so long as the evaluator completes " task/subtasks objective" section and signs, indicating that he/she actually performed the evaluation.</i>
55.	Q	Is it allowable to use a rubber stamp in place of actual signature?
	A:	<i>No, all signatures must be original.</i>